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*Attorneys for Defendants*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L.  
Madoff Investment Securities LLC,

Plaintiff,

v.

JAMES HELLER FAMILY, LLC, ESTATE OF JAMES  
HELLER, BARBARA H. FRIETAG, as personal representative  
and as an individual, STEVEN P. HELLER, as personal  
representative and as an individual, HARRY H. FALK, as  
personal representative, STEVEN P. HELLER REVOCABLE  
TRUST, a Florida trust, ROBERT P. SALTSMAN, as trustee,  
EVE FRIETAG, ELIZABETH FRIETAG DRANOFF, TRUST  
FBO AN.D. [a minor] UNDER ARTICLES SIXTH AND  
EIGHTH OF THE LAST WILL AND TESTAMENT OF JAMES  
HELLER, a New York trust, BARBARA H. FRIETAG, as trustee,  
TRUST FBO AL.D. [a minor] UNDER ARTICLES SIXTH AND  
EIGHTH OF THE LAST WILL AND TESTAMENT OF JAMES  
HELLER, a New York trust, BARBARA H. FRIETAG, as trustee,  
TRUST FBO S.H. [a minor] UNDER ARTICLES SIXTH AND  
EIGHTH OF THE LAST WILL AND TESTAMENT OF JAMES  
HELLER, a New York trust, STEVEN P. HELLER, as trustee,  
TRUST FBO KATHERINE HELLER UNDER ARTICLES  
SIXTH AND EIGHTH OF THE LAST WILL AND

Adv. Pro. No. 10-05419 (SMB)

TESTAMENT OF JAMES HELLER, a New York trust, STEVEN P. HELLER, as trustee, KATHERINE HELLER, and ELEANOR LEACOCK,

Defendants.

**NOTICE OF SUBSTITUTION OF COUNSEL AND ORDER**

PLEASE TAKE NOTICE that the law firm of Frejka PLLC, 733 Third Avenue, New York, New York 10017, shall be substituted in place of the law firm of Kramer Levin Naftalis & Frankel LLP, 1177 Avenue of the Americas, New York, New York 10036 as counsel of record for James Heller Family, LLC, Estate of James Heller, Barbara H. Freitag s/h/a Barbara H. Frietag, Steven P. Heller, Harry H. Falk, Steven P. Heller Revocable Trust, Robert P. Saltsman, Eve Freitag s/h/a Eve Frietag, Elizabeth Freitag Dranoff s/h/a Elizabeth Frietag Dranoff, Trust FBO AN.D. [a minor] under Articles Sixth and Eighth of the Last Will and Testament of James Heller, Trust FBO AL.D. [a minor] under Articles Sixth and Eighth of the Last Will and Testament of James Heller, Trust FBO S.H. [a minor] under Articles Sixth and Eighth of the Last Will and Testament of James Heller, Trust FBO Katherine Heller under Articles Sixth and Eighth of the Last Will and Testament of James Heller, Katherine Heller, and Eleanor Leacock (the “Defendants”) in this adversary proceeding. All notices given or required to be given in this adversary proceeding shall be given to and served upon the following:

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PLEASE TAKE FURTHER NOTICE THAT the Defendants have knowledge of and consent to this substitution of counsel.

Dated: New York, New York

Dated: New York, New York

March 23, 2015

KRAMER LEVIN NAFTALIS &  
FRANKEL LLP

By: /s/ Philip Bentley  
Philip Bentley  
1177 Avenue of the Americas  
New York, New York 10036  
Telephone: (212) 715-9100  
Facsimile: (212) 715-8000

Dated: New York, New York  
March 23<sup>rd</sup>, 2015

March 23, 2015

FREJKA PLLC

By: /s/ Elise S. Frejka  
Elise S. Frejka  
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SO ORDERED:

/s/ STUART M. BERNSTEIN  
HON. STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE